

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
MIDLAND DIVISION**

IN RE:	§ (CHAPTER 11)
TRINITY PUMPING UNITS, LLC	§ § CASE NUMBER 16-70040-rbk § § Chapter 11

**NOTICE OF LODGING OF STIPULATION AND AGREED ORDER EXTENDING
TIME FOR DEBTOR TO ANSWER INVOLUNTARY BANKRUPTCY PETITION**

Shores Lift Solutions Inc., BlackGold Equipment LLC, and CraneWorks Rental, LLC (together, the “**Petitioning Creditors**”) by and through their respective, undersigned counsel, hereby lodge a Stipulation and Agreed Order Extending Time for Debtor to Answer Involuntary Bankruptcy Petition (“Stipulation”), attached hereto as Exhibit A.

Dated: April 11, 2016

s/ Bernard R. Given, II
Bernard R. Given, II
LOEB & LOEB LLP
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Attorney for Petitioning Creditors

CERTIFICATE OF SERVICE

I hereby certify that on April 11, 2016, a true and correct copy of the **NOTICE OF LODGING OF STIPULATION AND AGREED ORDER EXTENDING TIME FOR DEBTOR TO ANSWER INVOLUNTARY BANKRUPTCY PETITION** was caused to be served electronically through the court's ECF noticing system.

By: /s/ Bernard R. Given
Bernard R. Given II

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
MIDLAND DIVISION**

IN RE:	§ (CHAPTER 11)
TRINITY PUMPING UNITS, LLC	§
	§ CASE NUMBER 16-70040-rbk
	§
	§ Chapter 11

**STIPULATION AND AGREED ORDER EXTENDING TIME FOR
DEBTOR TO ANSWER INVOLUNTARY BANKRUPTCY PETITION**

The Debtor in the above-captioned bankruptcy case and Shores Lift Solutions Inc., BlackGold Equipment LLC, and CraneWorks Rentals, LLC (together, the “**Petitioning Creditors**”) by and through their respective, undersigned counsel, state as follows:

WHEREAS on March 23, 2016, the Petitioning Creditors filed the Involuntary Petition [Docket No. 1] (the “**Petition**”) under Chapter 11 of Title 11 of the United States Code (the “**Bankruptcy Code**”) against the Debtor.

WHEREAS on March 25, 2016, the Debtor appeared in the bankruptcy case by and through Attorney R. Byrn Bass, Jr. [Docket No. 6].

WHEREAS on March 29, 2016, a Summons was issued on the Debtor [Docket No. 7] and served on the Debtor that same day.

WHEREAS the Debtor has 21 days to file a motion or answer to the petition after service of the Summons.

WHEREAS the Debtor and the Petitioning Creditors continue to negotiate a possible resolution of this matter.


NOW, THEREFORE, it is hereby stipulated, agreed, and so ordered that:

1. The Debtor shall have to and including May 6, 2016 to file a responsive pleading to the Petition.
2. This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this stipulation shall be deemed an original.

Dated: April 11, 2016

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Attorney for Debtor

WHEREAS on March 29, 2016, a Summons was issued on the Debtor [Docket No. 7] and served on the Debtor that same day.

WHEREAS the Debtor has 21 days to file a motion or answer to the petition after service of the Summons.

WHEREAS the Debtor and the Petitioning Creditors continue to negotiate a possible resolution of this matter.

NOW, THEREFORE, it is hereby stipulated, agreed, and so ordered that:

1. The Debtor shall have to and including May 6, 2016 to file a responsive pleading to the Petition.
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